

## STATUS OF THE STRYCHNINE CONSORTIUM

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### Abstract:

In 1986 and 1987 EPA issued Data Call-Ins (DCI) requiring technical registrants to submit data on toxicology, environmental fate, and efficacy. Because the data requirements were too costly for each technical registrant to individually fund, a Strychnine Consortium was formed in March, 1988 to fund strychnine data generation. The Consortium consists of APHIS, state agencies, and private producers, including all technical and end-use product registrants. The Denver Wildlife Research Center (DWRC) was asked and agreed to coordinate the activities of that Consortium. To generate funds, the Consortium placed a \$.50 per ounce surcharge on all sales of each technical product and, in addition, assessed each member \$3,000 in start-up fees. In October, 1988, all strychnine registrants received Notices of Intent to Suspend from the Environmental Protection Agency (EPA) because of noncompliance with the data submission schedule. Most registrants believed they had complied and requested an Administrative Hearing. The hearing, which was coordinated by the Consortium, resulted in a March 10, 1989 Strychnine Settlement Agreement specifying new data requirements and due dates. Since March, 1989, the Consortium has been generating data to meet the requirements of the Settlement Agreement. Since that time, strychnine is also undergoing reregistration and received a DCI in October, 1992. The DCI listed a number of studies in addition to those required by the Settlement Agreement, but negotiation with the EPA has greatly reduced the data requirements. Only two studies are currently being conducted for reregistration of strychnine technical:

#### Photodegradation-Soil Aerobic Soil Metabolism

Both of these studies are being conducted at the DWRC. The studies were previously submitted to the EPA but EPA requested additional data because, although DWRC was able to show that the compound degrades to a small degree, environmental scientists have had difficulty finding degradation products. Additional studies are underway.

The Strychnine Injunction prohibiting use of aboveground products is still in place. On April 13, 1993, EPA suggested that the Consortium prepare revised labeling for all aboveground uses conforming with the Fish and Wildlife Service (FWS) Biological Opinions. Once these labels were submitted, EPA would review them and if acceptable, send them to the FWS to concur. If the FWS concurred, EPA would petition the Court to overturn the Injunction. However, the FWS has since indicated that they have stated their requirements in the Biological Opinions and do not wish to review addition labels. The Consortium is attempting to coordinate talks between the FWS and EPA to determine what will be required in labeling.